

# **EXHIBIT B**

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Radica Enterprises Ltd. d/b/a Radica USA, Ltd. and  
Radica Games Limited

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

INFINITE MACHINES, LLC,  
Plaintiff,

v.

RADICA ENTERPRISES LTD. d/b/a  
RADICA USA LTD. and RADICA  
GAMES LIMITED.  
Defendants.

Civil Action No. 07-8625-AKH

**DOCUMENT  
ELETRONICALLY FILED**

**Declaration Of Chris Wilson In Support of Defendants' Motion to Transfer**

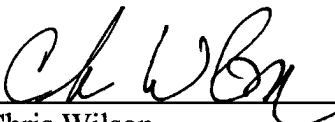
I, Chris Wilson, hereby declare as follows:

1. My name is Chris Wilson
2. I am over 18 years of age, I am competent to make this declaration, and I state that the facts herein are true and correct. I make this declaration based on personal knowledge of the facts set forth herein
3. I am Vice President of Marketing of Radica USA, Inc.
4. In September, 2005, I contacted John Boucard to inquire if he was interested in writing software for a new toy concept that Radica was developing, referred to as Bitty-Bytes.

5. Before Radica would disclose the Bitty Bytes concept to Mr. Boucard, I asked Mr. Boucard to sign and return a non-disclosure agreement. The non-disclosure agreement was transmitted by Radica in Texas to Boucard in California. Mr. Boucard executed the agreement and transmitted it back to Radica in Texas.
6. Radica disclosed aspects of its Bity Bytes concept to Mr. Boucard in an email and presentation sent from Texas to Mr. Boucard in California.
7. From September 2005 through January 2006, Radica and IM exchanged a series of emails, had conference calls, and transmitted presentations between Texas and California concerning the Bity Bytes concept, Boucard's alleged Footnotes idea, and Boucard's attempts to license Footnotes to Radica. These communications generally occurred between Texas and California.
8. There was one meeting between Mr. Boucard and employees of Radica in New York in October 2005. That meeting was scheduled in New York because several Radica employees were in New York to attend a toy fair. At that meeting, Mr. Boucard presented information prepared by both Radica and Mr. Boucard regarding Bity Bytes and Footnotes.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 15, 2008

  
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Chris Wilson  
Vice-President of Marketing  
Radica USA, Inc.